



OFFICE OF POLICE CHIEF

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BY ELECTRONIC FILING

January 10, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Petition for Rulemaking Filed by LoJack Corporation in Matter of Amendment of
Section 90.20(e)(6) of the Commission's Rules Regarding Stolen Recovery
Systems

Dear Ms. Dortch:

The Plano Police Department strongly supports the above-referenced Petition for Rulemaking ("Petition") filed by LoJack Corporation ("LoJack") requesting that the Commission expand the permitted uses and modify the technical requirements for operations on 173.075 MHz. The Plano Police Department also supports LoJack's request, in the comments it filed in ET Docket No. 04-243, that the Commission provide for a fourteen year transition period, commencing with the effective date of the final rules in the proceeding, to convert to narrowband operations on 173.075 MHz.

Our Police Department is located in the City of Plano, Texas, which has a population over 246,000 and is recognized as one of the safest cities in the United States with a population over 100,000. The Plano Police Department consists of 463 employees and is nationally accredited through the Commission on Accreditation for Law Enforcement Agencies (CALEA).

As described in the petition, LoJack seeks rule changes to allow it to provide public safety entities with additional services that will help us function better. LoJack also seeks changes to the technical rules that, in addition to facilitating these additional services, will enable LoJack to improve the performance of its stolen vehicle recovery system and to compensate for the effects of converting to narrowband operations. We believe LoJack's system enhancements will benefit us greatly.

Since the LoJack system was brought to the Dallas metroplex area, Plano has been the number one area for LoJack sales. This is bringing the ratio of LoJack equipped vehicles in balance with the vehicles being stolen. In other words, a LoJack equipped vehicle that is stolen is becoming more common, resulting in more recoveries taking place.



"Professionalism - Integrity - Progress"



LoJack equipped vehicles stolen from Plano have vastly improved the recovery rate of our reported stolen vehicles. Vehicles stolen that have been equipped with LoJack have been found at locations that have active drug labs working as well as other stolen vehicles at the same location not equipped with LoJack but were found with the LoJack tracked vehicle. Those vehicles would not have been located if not for the LoJack bringing us to the others. Carjacked and armed robbery vehicles stolen by violent means have been found with suspects still in them, resulting in not only a stolen vehicle being found but a violent offender being arrested. Multiple vehicles stolen at one time from dealerships who have already put LoJacks on them prior to sale have helped them get all the vehicles back quickly and at one time, keeping their inventory intact.

Our Organization would use and benefit from LoJack's proposed new services. For instance, by obtaining the position of stolen vehicles via GPS, we will be able to dispatch tracker equipped patrol vehicles to the general area where the stolen vehicles are located, and then perform the final tracking and recovery with the Vehicle Location Tracker. We believe this improvement will make our operations more efficient and significantly reduce the time elapsed from the theft of a vehicle and its recovery. This equates to far less damage to recovered vehicles and improved recovery rates.

As our country becomes a target for terrorist activities, we are increasingly concerned regarding the movement of hazardous and dangerous cargoes. LoJack's cargo tracking devices will enable us to track and recover stolen cargo that could threaten public safety and national security throughout all of North America. This will be accomplished by establishing a police operated national database of LoJack equipped containers and cargoes, which can be queried by any law enforcement agency in the United States.

We also support LoJack's concept of including additional public safety and security features in its network. In addition to stolen vehicle recovery, LoJack may provide automatic notification of a severe accident, including the location of the accident, directly to public safety. The network may also indicate the need for emergency medical or other assistance as appropriate. Finally, we support LoJack's concept of tracking individuals who are a risk, either to themselves or their community, including Alzheimer's victims, autistic children, and candidates for home arrest.

We respectfully ask the Commission to initiate the rulemaking LoJack proposed in its Petition. We also urge the Commission to provide LoJack with a fourteen-year period to complete its transition to the new narrowband operations.

Sincerely,

A handwritten signature in cursive script, reading "Gregory W. Rushin".

Gregory W. Rushin
Chief of Police

GWR/jw